

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	ELECTRONICALLY FILED
JEFFREY S. VAUGHN, individually and on	:	
behalf of those Class Members similarly situated,	:	Case No. 04 Civ. 8391 (DLC)
	:	
Plaintiff,	:	NOTICE OF MOTION IN
	:	SUPPORT OF MOTION
-against-	:	TO DIRECT ENTRY OF
	:	FINAL JUDGMENT UNDER
LEEDS, MORELLI & BROWN, P.C., LEEDS,	:	FED. R. CIV. P. 54(b)
MORELLI & BROWN, L.L.P., LEEDS &	:	
MORELLI, LEEDS, MORELLI & BROWN,	:	
PRUDENTIAL SECURITIES, INC.,	:	
PRUDENTIAL FINANCIAL, INC., LENARD	:	
LEEDS, STEVEN A. MORELLI, JEFFREY K.	:	
BROWN, JAMES VAGNINI, FREDERIC	:	
DAVID OSTROVE, ROBERT JOHN VALLI,	:	
JR., DISCRIMINATION ON WALL STREET,	:	
INC. DISCRIMINATION ON WALL STREET,	:	
MANHATTAN, INC., JOHN DOES, 1-10 AND	:	
JANE DOES, 1-10 a fictitious designation for	:	
presently unknown licensed attorneys,	:	
professionals and/or unknown persons or entities,,	:	
	:	
Defendants.	x	

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 54(b) and Rule 6.1 of the Local Civil rules of the United States District Court for the Southern District of New York, and upon the accompanying Memorandum of Law and Affirmation of Blaine H. Bortnick dated June 16, 2006, the undersigned hereby seeks an order from this Court, Hon. Denise L. Cote, U.S.D.J., at the United States Courthouse, 500 Pearl Street, New York, New York 10007, as soon as counsel may be heard, directing entry of final judgment under Federal Rule of Civil Procedure 54(b) on

the Memorandum Opinion and Order issued by this Court on March 20, 2006, which dismissed all claims against individual defendants Lenard Leeds, Steven A. Morelli, James Vagnini, Federic David Ostrove, and Robert John Valli, Jr. in this matter.

PLEASE TAKE FURTHER NOTICE THAT, pursuant to Local Civil Rule 6.1, opposing affidavits and answering memoranda shall be served within ten business days after service of the moving papers.

Dated: June 16, 2006
New York, New York

Respectfully submitted,

LIDDLE & ROBINSON, L.L.P.

By: /s/
Blaine H. Bortnick (BB 3686)

800 Third Avenue, 8th Floor
New York, New York 10022

Attorneys for Plaintiffs

TO: LITCHFIELD CAVO
420 Lexington Avenue, Suite 400
New York, NY 10170
Attention: Daniel T. Hughes, Esq.